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May 31, 2018

BY ECF

Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 219
New York, NY 10007

Re: *Paul Grimmatt v. New York City Department of Correctional Services, et al., Case No. 15-cv-07351 (JPO) (SN)*

Dear Magistrate Judge Netburn:

Kobre & Kim, LLP, represents Plaintiff Paul Grimmatt (“Plaintiff” or “Mr. Grimmatt”) as pro bono counsel in the above-referenced matter. We respectfully submit this letter in support of the May 30, 2018 letter submitted by Defendants Dr. Allan Matthew, Dr. Pushpendra Sharma, and Corizon Health, Inc. (collectively, the “Defendants”), and to provide additional context regarding expert discovery.

As to expert discovery, the parties communicated in numerous instances shortly before and after the April 17, 2018 expert discovery deadline in order to accommodate the schedules of the parties’ respective experts and/or the costs and fees borne by the parties in submitting the expert reports. For instance, in an effort to support Plaintiff’s case, Plaintiff’s counsel sought to rebut the expert reports received from Defendants on April 17th, the expert discovery deadline, and therefore served its expert disclosures shortly thereafter. Importantly however, throughout this process and with respect to the submission of each expert report, the parties provided one another with continued updates regarding the progress of disclosures.

As noted, Plaintiff respectfully supports Defendants’ request for a reasonable extension of time to seek additional expert discovery and move for summary judgment. Nonetheless, Plaintiff is mindful of the Court’s Individual Rules and Procedures with respect to requests for extensions, and acknowledges that, if the Court declines to extend the time for expert discovery as untimely, Plaintiff is prepared to proceed with briefing on summary judgement based upon the

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factual discovery and expert reports submitted by the parties to date without additional expert depositions.

Plaintiff is available at Your Honor's convenience should Your Honor have any questions.

Sincerely,

/s/ Jason Short

Jason Short

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Counsel for Plaintiff